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*Zydus Pharmaceuticals USA, Inc. and*  
*Cadila Healthcare, Limited*

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

TAKEDA PHARMACEUTICAL  
COMPANY LIMITED, TAKEDA  
PHARMACEUTICALS NORTH  
AMERICA, INC., TAKEDA  
PHARMACEUTICALS LLC,  
TAKEDA PHARMACEUTICALS  
AMERICA, INC., and ETHYPHARM,  
S.A.,

Plaintiffs,

v.

ZYDUS PHARMACEUTICALS USA  
INC. and CADILA HEALTHCARE  
LIMITED,

Defendants.

CIVIL ACTION NO:  
3:10-CV-01723-JAP-TJB

Return Date: July 16, 2012

**Oral Argument Requested**

**NOTICE OF MOTION FOR  
RECONSIDERATION OF ORDER  
DENYING-IN-PART LEAVE TO  
AMEND PRELIMINARY  
INVALIDITY AND NON-  
INFRINGEMENT CONTENTIONS**

To: Attached Service List

**PLEASE TAKE NOTICE** that on July 16, 2012, at 9:00 a.m., or as soon thereafter as counsel may be heard, counsel for defendants Zydus Pharmaceuticals, USA, Inc. and Cadila Healthcare, Limited (collectively “Defendants” or “Zydus”),

shall move, through its attorneys Kelley Drye & Warren LLP, before the Hon. Tonianne J. Bongiovanni for Reconsideration of Order Denying-in-Part Leave to Amend Preliminary Invalidity and Non-infringement Contentions.

**PLEASE FURTHER TAKE NOTICE** that in support of this motion, Zydus shall rely upon Defendants' Memorandum of Law in Support of Motion for Reconsideration of Order Denying-in-Part Leave to Amend Preliminary Invalidity and Non-infringement Contentions and the Supporting Declaration of Vincent P. Rao II.

**PLEASE TAKE FURTHER NOTICE** that oral argument is requested.

**PLEASE FURTHER TAKE NOTICE** that a proposed form of Order is submitted herewith in accordance with L. Civ. R. 7.1(e).

Dated: June 19, 2012

KELLEY DRYE & WARREN LLP

By: /s/ Vincent P. Rao II

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*Attorneys for Defendants*

*Zydus Pharmaceuticals USA, Inc. and*

*Cadila Healthcare Limited*

**CERTIFICATE OF SERVICE**

I hereby certify that on June 19, 2012 I caused to be served a copy of the foregoing Defendants Zydus Pharmaceuticals, USA, Inc. and Cadila Healthcare's Notice of Motion For Reconsideration Of Order Denying-In-Part Leave To Amend Preliminary Invalidity And Non-Infringement Contentions, and Supporting Declaration of Vincent P. Rao II, with Exhibits and a Proposed Order on each interested party in this action in accordance with the electronic filing procedures of the United States District Court for the District of New Jersey and via ECF on the following.

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Dated: June 19, 2012

*s/Vincent P. Rao II*  
Vincent P. Rao II